

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION**

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**SCOTT TURNAGE , CORTEZ D.  
BROWN, DEONTAE TATE, JEREMY S.  
MELTON, ISSACCA POWELL, KEITH  
BURGESS, TRAVIS BOYD, TERRENCE DRAIN,  
and KIMBERLY ALLEN on  
behalf of themselves and all similarly  
situated persons,**

**Plaintiffs,**

**v.**

**BILL OLDHAM, in his individual capacity and in  
his official capacity as the Sheriff of Shelby County,  
Tennessee; ROBERT MOORE, in his individual  
capacity and in his official capacity as the Jail  
Director of Shelby County, Tennessee;  
CHARLENE MCGHEE, in her individual capacity  
and in her official capacity as the Assistant Chief of  
Jail Security of Shelby County, Tennessee; DEBRA  
HAMMONS, in her individual capacity and in her  
official capacity as the Assistant Chief of Jail  
Programs of Shelby County, Tennessee; SHELBY  
COUNTY, TENNESSEE, a Tennessee  
municipality; and TYLER TECHNOLOGIES,  
INC., a foreign corporation; GLOBAL TEL\*LINK  
CORPORATION, a foreign corporation;  
SOFTWARE AG USA, INC., a foreign  
corporation; SIERRA-CEDAR INC., a foreign  
corporation; SIERRA SYSTEMS GROUP, INC., a  
foreign corporation, and TETRUS CORP, a foreign  
corporation,**

**Defendants.**

**Civil Action No. 2:16-cv-02907-SHM-  
tmp**

**(Hon. Judge Samuel H. Mays)**

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**DEFENDANTS BILL OLDHAM, ROBERT MOORE, CHARLENE MCGHEE, DEBRA  
HAMMONS, SHELBY COUNTY, TENNESSEE, TYLER TECHNOLOGIES, INC.,  
GLOBAL TEL\*LINK CORPORATION, SOFTWARE AG USA, INC., SIERRA-CEDAR,  
INC., SIERRA SYSTEMS GROUP, INC. AND TETRUS CORP'S MOTION AND  
SUPPORTING MEMORANDUM FOR EXTENSION OF TIME TO RESPOND TO  
PLAINTIFFS' MOTION AND MEMORANDUM FOR DISCOVERY CONFERENCE,  
TO PERMIT MERITS-BASED DISCOVERY, TO COMPEL DEPOSITIONS, AND FOR  
SANCTIONS AND FEES**

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The Defendants Bill Oldham, Robert Moore, Charlene McGhee, Debra Hammons, Shelby County, Tennessee Tyler Technologies, Inc., Global Tel\*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc. and Tetrus Corp. (Collectively “The Defendants”) pursuant to FED. R. CIV. P. 6 and 12 and other applicable provisions of law, move the Court to extend to Thursday, March 26, 2020, their time to respond to Plaintiffs’ Motion and Memorandum for Discovery Conference, to Permit Merits-Based Discovery, to Compel Depositions, and for Sanctions and Fees (“Motion”). (DE 291) In support of their Motion, Defendants state as follows:

MEMORANDUM OF FACTS AND LAW IN SUPPORT OF MOTION

1. Plaintiffs filed their Motion on March 5, 2020. (DE 291) Defendants have until Thursday, March 19, 2020 to file a responsive pleading.
2. This is a complex class action lawsuit filed on behalf of the plaintiffs.
3. The Defendants need additional time to investigate the statements and allegations in the Motion.
4. The Defendants also need additional time due to issues arising from the National Emergency.
5. Pursuant to Local Rule 7.2(a)(1)(B), counsel for Shelby County Defendants consulted with Michael McLaren, Plaintiffs’ co-counsel, regarding a seven (7) day extension.
6. Mr. McLaren consents to Defendants’ Motion for Extension of Time.
7. This Motion for Extension of Time is not intended to delay the Plaintiffs’ lawsuit.

8. A proposed Order granting the Motion for Extension of Time will be e-mailed to the Court for its consideration.

Therefore, the Defendants respectfully request the Court extend to March 26, 2020 their time to respond to the Plaintiffs' Motion.

Respectfully submitted,

/s/Odell Horton, Jr.

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*Attorney for Defendants Bill Oldham, Robert Moore,  
Charlene McGhee, Debra Hammons and Shelby  
County, Tennessee*

**CERTIFICATE OF CONSULTATION**

On March 13, 2020, Michael McLaren, Co-Counsel for the Plaintiffs and Odell Horton, Jr. Co-Counsel for the Shelby County Defendants, conferred via e-mail regarding the Proposed Motion for Extension of Time. Mr. McLaren agreed to this Proposed Extension of Time.

/s/ Odell Horton, Jr.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 17, 2020, a true and correct copy of the foregoing has been served upon the following counsel, via the Court's ECF filing system:

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/s/ Odell Horton, Jr.

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